

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Philadelphia Newspapers, LLC,

Debtor.

## Chapter 11

Case No. 09-\_\_\_\_\_()

### Joint Administration Requested

In re:

Broad Street Video, LLC,

Debtor.

## Chapter 11

Case No. 09-\_\_\_\_\_ ( )

### Joint Administration Requested

In re:

Philadelphia Media, LLC,

Debtor.

## Chapter 11

Case No. 09- ( )

### Joint Administration Requested

In re:

PMH Acquisition, LLC,

Debtor.

## Chapter 11

Case No. 09-\_\_\_\_\_ ( )

### Joint Administration Requested

In re:

Philadelphia Direct, LLC,

Debtor.

## Chapter 11

Case No. 09-\_\_\_\_\_ ( )

### Joint Administration Requested

In re:

Broad Street Publishing, LLC,

Debtor.

## Chapter 11

Case No. 09-\_\_\_\_\_ ( )

### Joint Administration Requested

\_\_\_\_\_  
In re:

Philly Online, LLC,

Debtor.

)  
) Chapter 11  
)  
) Case No. 09-\_\_\_\_\_( )  
)  
) Joint Administration Requested  
)  
)

\_\_\_\_\_  
In re:

PMH Holdings, LLC,

Debtor.

)  
) Chapter 11  
)  
) Case No. 09-\_\_\_\_\_( )  
)  
) Joint Administration Requested  
)  
)

**STATEMENT OF QUALIFICATION AS  
COMPLEX CHAPTER 11 CASE**

This chapter 11 case was filed on February 22, 2009. The undersigned attorney for the debtor believes that this case qualifies under Local Bankruptcy Rule 1002-2 as a complex chapter 11 case because the debtor's total debt exceeds the minimum requirement under Local Bankruptcy Rule 1002-2 of total debt in the amount of \$10 million, and

\_\_\_\_\_ the debtor's debt securities are publicly traded

\_\_\_\_\_ the debtor's equity securities are publicly traded, and/or

X  there are 100 or more parties in interest in the case.

Dated: February 22, 2009  
Philadelphia, Pennsylvania

  
(s/)

**DILWORTH PAXSON LLP**

Lawrence G. McMichael

Anne M. Aaronson

1500 Market St., Suite 3500E

Philadelphia, PA 19102

Telephone: (215) 575-7000

Facsimile: (215) 575-7200

*Proposed 327(e) and Local Counsel for the  
Debtors and Debtors-in-Possession*

**PROSKAUER ROSE LLP**

Mark K. Thomas (*pro hac vice* pending)

Paul V. Possinger (*pro hac vice* pending)

Three First National Plaza

70 West Madison, Suite 3800

Chicago, Illinois 60602-4342

Telephone: (312) 962-3550

Facsimile: (312) 962-3551

-and-

**PROSKAUER ROSE LLP**

Richard J. Corbi (*pro hac vice* pending)

1585 Broadway

New York, New York 10036

Telephone: (212) 969-3000

Facsimile: (212) 969-2900

*Proposed 327(a) Counsel for the Debtors and  
Debtors in Possession*